

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**KLAUSNER TECHNOLOGIES, INC.,  
Plaintiff,**

**vs.**

**AASTRA TECHNOLOGIES LTD, et al.,  
Defendants.**

**Case No.: 6: 11-cv-480-LED  
LEAD CASE**

**(6:11-cv-00575-LED)**

**STIPULATED MOTION FOR DISMISSAL WITH WITHOUT PREJUDICE  
BY DEFENDANTS BROADVOX, INC. AND  
CYPRESS COMMUNICATIONS OPERATING COMPANY, LLC**

Pursuant to Fed. R. Civ. P. Rule 41(a)(2), Defendants Broadvox, Inc. and Cypress Communications Operating Company, LLC (collectively “Withdrawing Defendants”) hereby respectfully request that the Court dismiss them without prejudice. The foregoing Defendants and the remaining Defendants Broadvox, LLC; BroadvoxGo!, LLC; Cypress Communications, Inc.; Cypress Communications, LLC (collectively “Remaining Defendants”) have advised Plaintiff IPVX Patent Holdings, Inc. (formerly Klausner Technologies, Inc.) that Broadvox, Inc. and Cypress Communications Operating Company, LLC have no involvement in the actions accused of infringement in the action, that the Remaining Defendants will provide any discovery that could have been properly obtainable from the Withdrawing Defendants, and that none of the Defendants will oppose any motion by Plaintiff to rejoin the Withdrawing Defendants upon cause. Additionally, Remaining Defendants waive: (a) any service objections; (b) any objections to venue, forum or personal jurisdiction in this district; and shall make no motion to dismiss pursuant to Federal Rules of Civil Procedure 12(b)(2) through and including 12(b)(7).

WHEREFORE, PREMISES CONSIDERED, Defendants hereby respectfully move the

Court to dismiss the Withdrawing Defendants from the case.

Respectfully Submitted,

November 13, 2012

/s/ George Pazuniak  
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*Attorneys for Defendant Broadvox Holding  
Company, LLC*

**CERTIFICATE OF CONFERENCE**

In compliance with Local Rule CV-7(h), I hereby certify that George Pazuniak, counsel for Defendants conferred with Jason M. Sobel on behalf of Pierre Yanney, counsel for Plaintiff, and this motion is unopposed.

/s/ George Pazuniak  
George Pazuniak

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic

service are being served this 13<sup>th</sup> day of November, 2012, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ George Pazuniak  
George Pazuniak